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VIA ECF

Hon. Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Request to File Exhibits Manually**
Full Circle United, LLC v. Bay Tek Entm't, Inc., No. 1:20-cv-03395-BMC

Dear Judge Cogan:

This letter is submitted on behalf of Defendant Bay Tek Entertainment, Inc. ("Bay Tek") in the above-captioned action.

We write pursuant to Your Honor's Individual Practices to respectfully request permission to manually file certain exhibits to Bay Tek's forthcoming Counterclaims. Specifically, these exhibits consist of several short videos created by Plaintiff, which videos Bay Tek will allege in the Counterclaims breach the parties' license agreement and constitute trademark infringement. Bay Tek intends to serve copies of the same videos on Plaintiff when it files and serves its Counterclaims.

Because the video files cannot be filed electronically, Bay Tek respectfully requests permission to transmit them manually to the Court on a storage device such as a USB drive, via Federal Express delivery. Pursuant to this Court's prior orders, Bay Tek is to file its Answer and Counterclaims on September 21, 2020.

We thank the Court for its consideration of this matter.

Respectfully,

/s/ Jeffrey M. Movit

Jeffrey M. Movit
A Professional Corporation for
MITCHELL SILBERBERG & KNUPP LLP